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Attorneys for Plaintiff, Michael R. Yazdi

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MICHAEL R. YAZDI, individually and on  
behalf of all persons similarly situated,

Plaintiff,

v.

CST USA, INC., a Delaware corporation dba  
Corner Store USA Holdings, Inc.; CST  
BRANDS, INC., a Delaware corporation;  
CST REAL ESTATE HOLDINGS, LLC, a  
Delaware limited liability company dba CST  
BRANDS REAL ESTATE HOLDINGS,  
LLC; CST REAL ESTATE HOLDINGS,  
INC., a Delaware corporation; CST  
BRANDS HOLDINGS, INC., a Delaware  
corporation; CST BRANDS HOLDINGS,  
LLC, a Delaware limited liability company;  
DOES I through X, inclusive; and ROE  
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO. 2:15-CV-00228-RFB-PAL

[Assigned to Hon. Richard Franklin Boulware II]

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO STAY DISCOVERY PENDING  
RULING ON DEFENDANTS' MOTION TO  
DISMISS FOR LACK OF PERSONAL  
JURISDICTION**

ACTION FILED: January 5, 2015

1 Defendants, CST USA, INC.; CST BRANDS, INC.; CST REAL ESTATE HOLDINGS, LLC;  
2 CST REAL ESTATE HOLDINGS, INC.; CST BRANDS HOLDINGS, INC., and CST BRANDS  
3 HOLDINGS, LLC (“Defendants”) and Plaintiff, Michael R. Yazdi (“Plaintiff”) (Defendants and  
4 Plaintiff are collectively referred to as the “Parties”), by and through their respective attorneys of record  
5 stipulate and agree as follows:

6 WHEREAS, on August 14, 2015, Defendants filed a motion to dismiss for lack of jurisdiction,  
7 or in the alternative to transfer this action to the District of Arizona, (the “Motion,” Docket No. 18)  
8 based primarily on (i) the terms and conditions of the promotional contest at issue in this case  
9 confirming that the contest was open exclusively to Arizona residents and requiring Arizona jurisdiction  
10 and venue, and (ii) information recently received indicating that Plaintiff was a resident of Arizona at  
11 the time of the promotional contest.

12 WHEREAS, in light of this new and potentially dispositive information, and in light of the  
13 Court’s pending decision on the Motion establishing the proper jurisdiction and venue for this matter,  
14 the parties believe that litigating in this District under the current discovery schedule would be  
15 inequitable, and may lead to significant unnecessary and duplicative work.

16 NOW, THEREFORE, in the interest of efficiency and judicial economy, the Parties respectfully  
17 request that the Court enter an order staying discovery pending the resolution of Defendants’ Motion to  
18 dismiss for lack of personal jurisdiction.

1 Within 14 days of the entry of the Court's order denying the Motion and retaining jurisdiction in  
2 this District, the Parties will submit a modified discovery and briefing schedule based on the timelines  
3 previously approved and entered by this Court.

4 **IT IS SO STIPULATED.**

5 DATED: August 18, 2015

GREENBERG TRAURIG, LLP

6  
7 By /s/ Tyler R. Andrews

8 Tyler R. Andrews

9 Moorea L. Katz

Attorneys for Defendants

10 DATED: August 18, 2015

MARQUIS AURBACH COFFING

11 By: /s/ Candice E. Renka

12 Scott A. Marquis

13 Candice E. Renka

Attorneys for Plaintiff, Michael R. Yazdi

14  
15 ----- **ORDER**

16 IT IS SO ORDERED on this 21 day of September, 2015.

17   
18 United States Magistrate Judge

**CERTIFICATE OF SERVICE**

I hereby certify that I served the **JOINT STIPULATION AND [PROPOSED]  
ORDER TO STAY DISCOVERY PENDING RULING ON DEFENDANTS' MOTION  
TO DISMISS FOR LACK OF PERSONAL JURISDICTION** on:

**MARQUIS AURBACH COFFING**

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by causing a full, true, and correct copy thereof to be sent by the following indicated method or  
methods, on the date set forth below:

**THROUGH E-SERVICE VIA CM/ECF E-FILING SYSTEM**

DATED this 18th day of August, 2015.

*/s/ Cynthia Aros*

Cynthia Aros

An employee of Greenberg Traurig, LLP